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November 19, 2023

VIA ECF AND

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The Honorable Andrew L. Carter, Jr.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007


MEMO ENDORSED

RE: *An et al. v. Shan et al.*, Case No. 22-cv-10060-ALC (S.D.N.Y.)

Dear Judge Carter:

I am Counsel for the Plaintiffs in the above-referenced matter. Your Honor, I write to respectfully request additional time to submit a responsive memoranda to #48, Defendants' "MEMORANDUM OF LAW in Support re: [31] MOTION for Sanctions / *Defendants' Application for Attorneys' Fees and Costs*". I became aware of said motion when I received notice of #50 "Notice of Plaintiffs' Failure to Oppose Application..." For reasons I do not know, I never saw the ECF notice of motion #48 when it was filed, and do not have it in my email inbox. There were a few days in early October that I had some issues with my email, which probably is related, but as I am not an IT expert I am uncertain as to the cause. Additionally, I note that the ECF advises this case as having been closed September 25, 2023, which has also been somewhat confusing.

In consideration of the holiday next week I am requesting until December 1, 2023 to file a responsive memorandum to #48. In consideration of the time-sensitive nature of this request I am filing this on an expedited manner, and technically I have not yet received a response from opposing counsel on this request.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Sincerely,



Dated: November 22, 2023
New York, NY

Richard N. Freeth

CC: Yongbing Zhang, Esq.
